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11 Attorneys for Defendant
RICHEMONT NORTH AMERICA, INC.

12
13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 FLOR JIMENEZ, individually and on behalf of
all others similarly situated,

16 Plaintiff,

17 vs.

18 RICHEMONT NORTH AMERICA, INC.
19 d/b/a MONTBLANC, a Delaware corporation;
20 and DOES 1 to 10, inclusive,

21 Defendants.

Case No. 2:21-cv-01031-JAM-JDP

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT RICHEMONT
NORTH AMERICA, INC. TO RESPOND
TO PLAINTIFF FLOR JIMENEZ'S
INITIAL COMPLAINT**

Complaint Served: June 18, 2021
Current Response Date: October 14, 2021
New Response Date: November 15, 2021

1 WHEREAS, Plaintiff Flor Jimenez (“Plaintiff”) filed her Complaint on June 10, 2021;

2 WHEREAS, Defendant Richemont North America, Inc. (“Defendant”) (Plaintiff and
3 Defendant collectively referred to as the “Parties”) was served through waiver of service on June
4 18, 2021;

5 WHEREAS, through the Parties’ prior stipulation, Defendant’s current responsive
6 pleading deadline is October 14, 2021;

7 WHEREAS, Defendant is still in the process of assessing Plaintiff’s allegations which is a
8 time-consuming process given the highly technical nature of the allegations. Defendant will need
9 more time to continue its assessment of Plaintiff’s allegations including discussions with
10 individuals who are responsible for the programming and content of its website;

11 WHEREAS, the Parties also are in the process of discussing potential informal resolution
12 of this matter including exchanging informal discovery, and would like additional time to
13 continue these discussions; and

14 WHEREAS, the Parties’ respective counsel have met and conferred and stipulated to a 30-
15 day extension of time for Defendant to respond to Plaintiff’s Complaint. Good cause exists for
16 the requested extension because successfully resolving this matter at the pleading stage promotes
17 judicial economy by allowing the Court to focus its scarce resources on other matters.

18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the
19 Parties’ respective counsel as follows:

20 Defendant’s deadline to file a responsive pleading to Plaintiff’s Complaint shall be
21 extended by 30 calendar days (continued to the first non-holiday weekday), to November 15,
22 2021.

23 Dated: October 14, 2021

CENTER FOR DISABILITY ACCESS

24 By /s/ Thiago Coelho

25 Thiago Coelho
26 Attorney for Plaintiff
27 FLOR JIMENEZ
28

1 Dated: October 14, 2021

MORGAN, LEWIS & BOCKIUS LLP

2 By /s/ Kathy H. Gao

3 KATHY H. GAO

Attorney for Defendant

4 RICHEMONT NORTH AMERICA, INC.

SIGNATURE ATTESTATION

5 I hereby attest that all signatories listed above, on whose behalf this stipulation is
6 submitted, concur in the filing's content and have authorized the filing.

7 Dated: October 14, 2021

MORGAN, LEWIS & BOCKIUS LLP

8 By /s/ Kathy H. Gao

9 KATHY H. GAO

Attorney for Defendant

10 RICHEMONT NORTH AMERICA, INC.

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12
13
14 **ORDER**

15 After considering the Parties' stipulation and good cause appearing, IT IS HEREBY
16 ORDERED that: Defendant's deadline to respond to Plaintiff's Complaint shall be extended to
17 November 15, 2021.

18 **IT IS SO ORDERED.**

19
20
21 Dated: October 14, 2021

/s/ John A. Mendez

22 THE HONORABLE JOHN A. MENDEZ

23 UNITED STATES DISTRICT COURT JUDGE